

Revised 12/03

CORRES. CONTROL
INCOMING LTR NO.

00291 RF04

DUE DATE

ACTION

DIST.	LTR	ENC
BERARDINI, J.H.	X	X
BOGNAR, E.S.	X	X
BROOKS, L.	X	X
BUTLER, L.	X	X
CARPENTER, M.	X	X
CROCKETT, G. A.		
DECK, C. A.	X	X
DEGENHART, K. R.		
DIETER, T. J.		
FERRERA, D. W.	X	X
GIACOMINI, J. J.		
LINDSAY, D. C.	X	X
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NESTA, S.		
NORTH, K.	X	X
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.	X	X
PIZZUTO, V.M.		
TOBIN, M.		
TUOR, N. R.	X	X
WIEMELT, K.		
WILLIAMS, J. L.		
ZAHM, C.	X	X

COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Reviewed for Addressee
Corres. Control RFP

7/14/04
Date By

Ref. Ltr. #

DOE ORDER #

3400 1

RECEIVED

2004 JUL 14 A 10:07

STATE OF COLORADO

CORRESPONDENCE

CONTROL

Bill Owens, Governor

Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.

Denver, Colorado 80246-1530

Phone (303) 692-2000

TDD Line (303) 691-7700

Located in Glendale, Colorado

<http://www.cdphe.state.co.us>

Laboratory and Radiation Services Division

8100 Lowry Blvd.

Denver, Colorado 80230-6928

(303) 692-3090



Colorado Department
of Public Health
and Environment

July 9, 2004

Mr. Joseph Legare

Director, Project Management Division

U.S. Department of Energy

Rocky Flats Field Office

10808 Highway 93, Unit A

Golden, Colorado 80403-8200

**RE: APPROVAL, DRAFT, ENVIRONMENTAL RESTORATION, RFCA STANDARD OPERATING
PROTOCOL FOR ROUTINE SOIL REMEDIATION, FY04 NOTIFICATION #04-10, IHSS GROUP 700-11**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby approves the subject notification to proceed with the excavation of Bowman's Pond, the drainage channel leading into the pond, and an isolated occurrence of Aroclor 1254 east of the pond. Excavation may continue until confirmation samples yield satisfactory results for all constituents.

This approval is being granted prior to the full availability of characterization data collected under SAP addendum #1A-04-10 approved on March 26, 2004. Several factors have made expedited removal of the known contamination desirable. Any further soil or sediment excavation, that becomes necessary as additional data are received, will be addressed through a Regulatory Contact Record.

It will also be necessary to revise the document consistent with the Division's comments on the draft document, attached. Of particular interest is the potential for contamination from Bowman's Pond, or the Aroclor exceedance in soil, to have migrated beyond the MSS 700-1108 boundary via the storm drain from the Steam Condensate Tanks. Consequently, the Division's Comment No. 6 must be addressed in the document. The potential for migration via the storm drain will be assessed through confirmation samples surrounding the excavations, previously planned confirmation samples on the north side of the Steam Condensate Tank pad, and sample boring CH49-025.

The issues and resolutions, discussed above, must be fully reflected in meeting minutes as part of the Administrative Record.

We look forward to verifying the final, revised document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337, or David Kruchek at 303-692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc: Mark Aguilar, EPA
Norma Castaneda, DOE

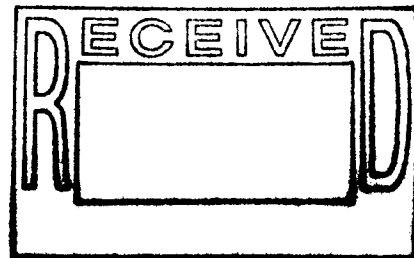
Mark Sattelberg, U.S.F&W
Dave Shelton, KH

Lane Butler, KH
Administrative Records Building T130G

HA RFETS/700-11 IHSS Group Notification (#1A-04-10) Approval.doc

ADMIN RECORD

1A-A-002205



Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Environmental Restoration
RFCA Standard Operating Protocol
for
Routine Soil Remediation
FY04 Notification #04-10

IHSS Group 700-11
(Bowman's Pond and Steam Condensate Tanks)

June 2004

General Comment:

1. Please explain the rationale for submitting this notification prior to the completion of the investigation under the **SAP** Addendum approved on March 26, 2004. The Addendum included sampling locations beyond the "Potential Remediation Areas" shown on Figure 2. Consequently, the figure may be grossly understating, or overstating, the area of soil removal. (Depth of soil removal is also undefined and Figure 2 is not sufficiently specific.) Please provide the Division with the proposed excavation schedule and the expected date that investigation data will be available for inclusion into this notification (or available for Division review to expedite approval).

Specific Comments:

2. Table 1: What is the basis for the estimated volume of 200 cubic yards of soil to be excavated?
3. Section 2.2: In the last paragraph, regarding the determination of USACE, was this a written determination? If not, is Mr. McKee's "determination" sufficient to support the elimination of the wetlands without a tradeoff? Please address.
4. Section 2.3: The phrase "in soil 6 inches from the ground surface" may be misconstrued as inclusive of 0-6 inches. Please be consistent with the "below 3 feet" language for PU/AM.
5. Screen 3: Please note the lack of OPWLs relative to Attachment 14.
6. Screen 4: The discussion fails to account for the storm drain that served the condensate tanks. Although it appears that the storm drain was isolated from the COCs and releases associated with Bowman's Pond and the drainage leading to SW120, this may not be factual. Since the storm drain probably was not a tightly sealed line, the potential for influent from Bowman's Pond to enter the line and spread contaminants between Bowman's Pond and SW-93 must be considered. It appears that sampling at the outfall of this line, near SW-93, is necessary. If COCs are evident at the outfall, soil sampling between Bowman's and SW-93 will become necessary. Nevertheless, it may also be necessary to collect soil samples down gradient of Bowman's, along the line, even if the outfall samples are negative for **COCs**. Please address.
7. Section 2.6: Please provide the Division with details on how the third remediation goal will be met. Unlike most soil removal actions, this one is within drainage. Please address.
8. Section 2.8: What work controls will determine whether air samples will actually be used? Why, why not? Please address.
9. Section 3.0: Please revise the date to July 2004, or if it becomes necessary per Comment No. 1, a later date.